

Phase II Recommendations

Out of the Conclusions of the research, the CLI developed suggested Recommendations. These Recommendations were developed by the CLI Partner and Task Force Members in September 1998, and subsequently were presented to the EPA. The complete list of suggested Recommendations stemming from the September 1998 Partners and Task Force meeting follows.

Signal Words and Hazard Hierarchy Recommendations

Product Label Changes

1. For products that fall into toxicity categories 1, 2, or 3, recommend that manufacturers be encouraged to voluntarily put one or more bullet points underneath the signal word on the front label, explaining the precautions associated with the product. The statement which currently refers people to turn to the back of the package for more explanation of the precautions should remain on the front of the label.

Further Research

1. Recommend that additional research be conducted on the effects of “highlighting” and graphical depictions of the signal words on the front of the label before any such changes are implemented. (“Highlighting” means things such as bolding the word, boxing the word, using colors to make the word stand out, making the word bigger, etc.; graphical depictions could include bar graphs, thermometers, “laugh meters,” or similar designs incorporating all three words into a hierarchical visual format.) Also explore as a part of this research “information fragmentation” (i.e., placing precautionary-related information on both the front and back label panels) issues. Note on intent: the need for this research is not intended to preclude the change recommended pertaining to placing the precaution bullet on the front panel with the signal word.

Policy Choices

1. For toxicity category 4 products only, the EPA should consider not having a signal word. (Currently, both category 3 and category 4 products can have the signal word “Caution” associated with them.)
2. The EPA should determine what the consumer should understand about signal words and the hazard hierarchy. If the intent is for the signal words to flag for the consumer that care should be taken, then the recommendations here are enough along with appropriate educational efforts (see education recommendations). If the intent is for the hazard hierarchy to be understood, then additional research and education are necessary.

Consumer Education

1. Recommend that an effort be made to educate consumers about the meaning of the signal words, and how they are defined and used on labels. This should be done in a factual context, and without judgement calls which conclude the meaning for the consumer (i.e., the Agency should not recommend that consumers always buy products marked CAUTION in preference to products marked DANGER).

Ingredients Recommendations

Product Label Changes

1. Recommend that the EPA not make any across-the-board label changes for ingredients at the present time.
2. Recommend that the EPA allow manufacturers the flexibility to voluntarily provide “other ingredient” information on the label in a way that consumers in the study expressed they wanted (i.e., listed by category, perhaps with some explanation of purpose).
3. Recommend that the EPA allow manufacturers more flexibility in where they provide ingredient information (e.g., back panel versus front panel).

Further Research

1. Recommend that the EPA conduct further research to identify how to supply consumers’ expressed need for medical information to people who want it. It was noted that information learned from the quantitative research of Phase II should be incorporated in any further research.

Policy Choices

1. Recommend that the EPA further examine how to provide ingredient information on the label in the way consumers expressed they want it, as indicated by the research (i.e., give them categories of ingredients along with the purpose.) Also, refer to research recommendations in the format section.

Consumer Education

1. Educate consumers about ingredient information on labels (i.e., why they appear on the label and the meaning of “active” and “other”), through the “Read the Label *FIRST!*” campaign. Additionally, it was suggested that the education campaign be utilized to inform the public about where to get health and safety information, e.g., for people prone to allergies, etc.

Label Format Recommendations

Product Label Changes

1. Recommend that statements that were clearly preferred by consumers in the quantitative research be used, as appropriate, and that the EPA make program changes to allow this to happen to the extent possible.

Directions for Use

2. Recommend that the EPA consider replacing the statement, “It is a violation of Federal law to use this product in a manner inconsistent with its labeling,” with the simpler phrase tested on the quantitative survey — “Use only as directed on this label.”

3. Recommend that manufacturers *voluntarily* put direction for use in bulleted form with no wrapping text (i.e., making sure that each new direction for use is set off on a separate line, and does not continue on the same line), using ordinal numbers if sequence is important.

Precautionary Statements

4. Recommend that manufacturers *voluntarily* put the principal health hazard information from the precautionary statements in bulleted form underneath signal words.
5. Recommend that manufacturers and the EPA, where possible, use simple language, avoiding jargon; avoid wrapped text; keep sections together in same column; use more white space; and eliminate needless words. This recommendation was particularly expressed with regard to precautionary statements.
6. Recommend that the EPA remove language that is not appropriate to consumers from precautionary statements, e.g., language more appropriate for agricultural pesticides, etc.

Precautionary Statements — First Aid Specific

7. Recommend that manufacturers *voluntarily* put First Aid information in a table format and within a box.
8. Recommend that manufacturers who provide a toll-free number for emergencies voluntarily include that number beneath or within any table/box that includes First Aid information.

Further Research

1. Recommend that further research be structured to investigate location and presentation of ingredient information (e.g., placing ingredient information on the front or back of the label, tabular formats, etc.), before any across-the-board changes are made to ingredients information. This recommendation addresses the variation in need which can arise between product categories, e.g., indoor and outdoor versus cleaner product labels.
2. Recommend that further research be conducted to investigate how the information hierarchy (i.e., information that consumers in the quantitative research said was most important to them) translates into the order in which information appears on labels.

Policy Choices

1. Given the efforts in other non-CLI forums to standardize the use of icons, further work on this topic should not be pursued as a part of the CLI.

Consumer Education

1. Recommend that the “Read the Label *FIRST!*” campaign educate consumers that it is acceptable for them to open and read label booklets (particularly for outdoor pesticide products) in the store.

Consumer Education and “Read the Label *FIRST!*” Recommendations

It was noted that the Consumer Education Subgroup will address any recommendations from other topic areas related to Consumer Education.

1. Educate consumers on what specific parts of the label mean or are intended to communicate; specifically, signal words, active and other ingredients, storage and disposal, and precautionary statements including First Aid.
2. As the CLI project continues, expand membership of the Consumer Education Subgroup to include brand managers, marketing staff, and label designers from within the Partner companies, particularly with respect to designing and assessing the impact of the logo for the “Read the Label *FIRST!*” campaign.
3. Recommend that messages conveyed through the consumer education campaign be market-tested in appropriate ways before they are launched.
4. Recommend that retailers be brought into the Consumer Education Subgroup, as they will be important for distributing the messages developed by the group.

Storage and Disposal Recommendations

Phase II Follow Up

1. Recommend that the EPA send information from the quantitative study about recycling symbols (those with chasing arrows) to relevant organizations.
2. Recommend the EPA gather any available information on risk assessments regarding product disposal from states, manufacturers, and other appropriate organizations and share this information with all applicable parties, in an effort to coordinate these types of studies.
3. Recommend that the quantitative data on disposal practices be sent to the North American Hazardous Materials Management Association (NAHMMA) and that NAHMMA be encouraged to share this information with its members.

Product Label Changes

1. Recommend that for empty containers, the statement on product labels read, “Place in trash. Recycle where available.” The recycling statement would be optional for manufacturers. Also optional, manufacturers may use the statement that reads: “Do not re-use container.”
2. Recommend that, given that there was no agreement on label statements for partially filled containers, there be a delay in any *Pesticide Registration (PR)* notice regarding the disposal statement on empty containers until the EPA makes a policy decision about how to handle partially filled containers.

3. Recommend to keep the status quo for storage statements on product labels.